



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 12, 2022

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Application GRANTED.

SO ORDERED.
Date: 5/13/2022

P. Kevin Castel
United States District Judge

Re: *United States v. Guzman Martinez et al.*, S9 19 Cr. 536 (PKC)

Dear Judge Castel:

The Government respectfully writes to request an additional one-week adjournment of the pretrial motions schedule in the above-captioned case. The Government had extended formal plea offers to the defendants, with expiration dates of May 9, 2022. However, to date, defense counsel for defendants housed at the Brooklyn Metropolitan Detention Center ("MDC") have been unable to coordinate sufficient meetings or legal calls their clients to meaningfully discuss the plea offers, due to issues with the MDC's canceling scheduled legal calls. Accordingly, the Government has extended the plea deadlines to May 18, 2022, and respectfully requests that the Court adjourn the current pretrial motions deadlines by one week, to permit the parties sufficient time to determine whether the case may be resolved through pretrial resolution(s). The parties' proposed new motions deadlines are as follows:

May 24, 2022: Government submissions due]	OK
June 7, 2022: Defense responses and submissions due		
June 21, 2022: Government replies due		

The proposed new schedule will not alter the date of the final pretrial conference, which is presently scheduled for June 28, 2022 at 2:00 p.m. The Government has spoken with defense counsel for all defendants, who consent to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for
the Southern District of New York

By:
Juliana N. Murray / Ryan B. Finkel /
Peter J. Davis
Assistant United States Attorneys
(212) 637-2314 / -6612 / -2468

cc: All Counsel (by ECF)